

Exhibit A



Notice of Service of Process

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Transmittal Number: 27277422
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Primary Contact: Emma Sword
Martenson, Hasbrouck & Simon LLP -- Allied Universal
2573 Apple Valley Rd NE
Brookhaven, GA 30319-3134

Entity:	Universal Protection Service, LP Entity ID Number 4299152
Entity Served:	Universal Protection Service, LP d/b/a Allied Universal
Title of Action:	Twana Ahmed vs. Universal Protection Service, LP, d/b/a Allied Universal
Matter Name/ID:	Twana Ahmed vs. Universal Protection Service, LP, d/b/a Allied Universal (14330541)
Document(s) Type:	Citation/Petition
Nature of Action:	Discrimination
Court/Agency:	Harris County District Court, TX
Case/Reference No:	2023-39270
Jurisdiction Served:	Texas
Date Served on CSC:	07/13/2023
Answer or Appearance Due:	10 o'clock a.m. on the Monday next following the expiration of 20 days after service
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CAUSE NO. 202339270

RECEIPT NO. 1001388

75.00 CTM

TR # 74192952

PLAINTIFF: AHMED, TWANA

vs.

DEFENDANT: UNIVERSAL PROTECTION SERVICE LP (DBA ALLIED
UNIVERSAL)In The 334th
Judicial District Court
of Harris County, Texas
334TH DISTRICT COURT
Houston, TX

CITATION (CERTIFIED)

THE STATE OF TEXAS
County of HarrisTO: UNIVERSAL PROTECTION SERVICE, LP D/B/A ALLIED UNIVERSAL BY SERVING ITS
REGISTERED AGENT CORPORATION SERVICE COMPANY D/B/A CSC LAWYERS
INCORPORATING SERVICE COMPANY
OR WHEREVER THE REGISTERED AGENT MAY BE FOUND

211 EAST 7TH STREET SUITE 620 AUSTIN TX 78701

Attached is a copy of PLAINTIFFS ORIGINAL PETITION AND JURY DEMANDThis instrument was filed on the 10th day of July, 2023, in the above cited cause number
and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a
written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday
next following the expiration of 20 days after you were served this citation and petition,
a default judgment may be taken against you. In addition to filing a written answer with the
clerk, you may be required to make initial disclosures to the other parties of this suit. These
disclosures generally must be made no later than 30 days after you file your answer with the
clerk. Find out more at TexasLawHelp.org.

TO OFFICER SERVING:

This citation was issued on 10th day of July, 2023, under my hand and
seal of said Court.*Marilyn Burgess*MARILYN BURGESS, District Clerk
Harris County, Texas
201 Caroline, Houston, Texas 77002
(P.O. Box 4651, Houston, Texas 77210)

Issued at request of:
HERNANDEZ, AMANDA CHRISTINE
5718 WESTHEIMER, SUITE 1000
HOUSTON, TX 77057
Tel: (915) 204-8928
Bar No.: 24064411

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CLERK'S RETURN BY MAILING

Came to hand the _____ day of _____, _____, and executed by
mailing to Defendant certified mail, return receipt requested, restricted delivery, a true
copy of this citation together with an attached copy of
PLAINTIFFS ORIGINAL PETITION AND JURY DEMAND
to the following addressee at address:

(a)ADDRESSEE

ADDRESS

Service was executed in accordance with Rule 106
(2) TRCP, upon the Defendant as evidenced by the
return receipt incorporated herein and attached
hereto at

on _____ day of _____,
by U.S. Postal delivery to _____

This citation was not executed for the following
reason: _____

MARILYN BURGESS, District Clerk
Harris County, TEXAS

By _____, Deputy

6/26/2023 11:02 PM
Marilyn Burgess - District Clerk Harris County
Envelope No. 76983522
By: Wanda Chambers
Filed: 6/26/2023 11:02 PM

2023-39270 / Court: 334

CAUSE NO. _____

Twana Ahmed,	§	IN THE DISTRICT COURT
	§	
Plaintiff,	§	
	§	
vs.	§	OF HARRIS COUNTY, TEXAS
	§	
Universal Protection Service, LP, d/b/a	§	
Allied Universal	§	
	§	
Defendant,	§	_____ JUDICIAL DISTRICT

ORIGINAL PETITION AND JURY DEMAND

INTRODUCTION

1. This is an unlawful employment practices case. It involves claims under (1) Chapter 21 of the Texas Labor Code, also known as the Texas Commission on Human Rights Act ("TCHRA"), (2) 42 U.S.C. § 2000e *et seq.*, known as Title VII of the Civil Rights Act of 1964 ("Title VII"), and (3) 42 U.S.C. § 1981 ("Section 1981") for race (including ethnic characteristics and ancestry), national origin, and religious discrimination, and retaliation for opposing this discrimination.
2. The TCHRA and Title VII prohibit all employment practices that limit or deprive any individual of employment opportunities because of his race, national origin, or religion. These statutes also prohibit discrimination with respect to any terms, conditions, or privileges of employment because of an individual's race, national origin or religion.

3. Section 1981 protects all people in the United States. It guarantees all people with the right to make and enforce contracts no matter their ethnic characteristics, race, or ancestry.¹
4. Each of these statutes, the TCHRA, Title VII, and Section 1981, all prohibit retaliation against an individual that reports or opposes the discrimination covered by the statute.

DISCOVERY CONTROL PLAN

5. Plaintiff intends to conduct discovery under Level 3 pursuant to Rule 190 of the Texas Rules of Civil Procedure.

PARTIES

6. Universal Protection Service (“Allied Universal”) is a Foreign Limited Partnership located in Santa Ana, California. It does business as Allied Universal according to its Texas Secretary of State filings. It conducts business in Houston, Texas, and conducted business in Houston, Texas at the time the claims asserted herein accrued. It may be served with process through its registered agent as follows:

Universal Protection Service, LP d/b/a Allied Universal
c/o its registered agent in Texas
Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
211 E. 7th Street, Suite 620
Austin, Texas 78701-3136

7. Twana Ahmed is an individual and citizen of the United States, who resided in Harris County, Texas at the time the claims asserted herein accrued, and who continues to reside in Harris County, Texas.

¹ See *St. Francis College v. Al-Khazraji*, 481 U.S. 604, 613 (Explaining that the history of § 1981 makes clear the statute was intended to protect people subjected to discrimination because of their ancestry or ethnic characteristics. “Such discrimination is racial discrimination that Congress intended § 1981 to forbid, whether or not it would be classified as racial in terms of modern scientific theory.”).

JURISDICTION

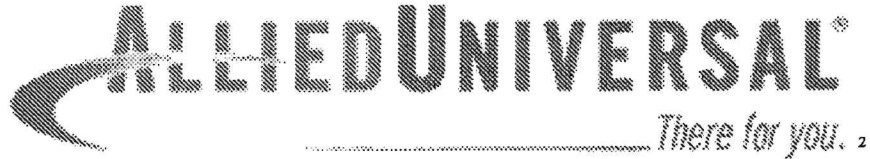
8. This Court has subject-matter jurisdiction over this case because: (1) Plaintiff seeks damages within its jurisdictional limits, (2) the Court has concurrent jurisdiction over Title VII and Section 1981 claims, and (3) the asserted claims are not subject to exclusive jurisdiction in another court.
9. This Court has personal jurisdiction over the Defendant because: (1) the claims asserted against Defendant arose directly from its acts and omissions in Texas, and (2) its affiliations with Texas are so continuous and systematic that it is “essentially at home” in Texas.

VENUE

10. Venue is proper in Harris County, Texas under Texas Civil Practice and Remedies Code §15.002 as all or a substantial part of the events or omissions giving rise to the claims occurred in this county. This case involves unlawful employment practices that took place in Harris County, Texas.

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ABBREVIATED BACKGROUND



Scope of Allied Universal's businesses and employment policies

11. Allied Universal is considered the world's largest private security company, generating more than \$18 billion in revenue.³
12. Allied Universal provides security guards, equipment, and technology as part of its commercial security services.⁴
13. Allied Universal is a conglomerate that includes various services, such as Security Services, Technology Services, Event Services, Janitorial Services, and Risk Advisory and Consulting Services.
14. Allied Universal operates in over 90 countries, and has a global workforce of approximately 800,000 workers.⁵
15. In North America, defendant operates its business under its existing Allied Universal brand, and internationally it operates under the G4S brand.⁶

² The Allied Universal logo is from Allied Universal's website, www.aus.com (last visited June. 26, 2023).

³ See Yadarisa Shabong, *G4S saga ends as shareholders accept \$5.3 billion Allied Universal offer*, REUTERS, MAR. 16, 2021, <https://www.reuters.com/article/us-g4s-m-a-allied-universal-idUSKBN2B82F4>

⁴ See Commercial Security Services, <https://www.aus.com/our-services/security-services> (last visited June. 26, 2023).

⁵ See Our Story, <https://www.aus.com/our-story> (last visited June. 26, 2023).

⁶ *Id.*

16. Allied Universal grew through several acquisitions of other brands. It continues to expand both geographically and through the security services it provides.⁷
17. In its Global Code of Ethics updated in February of 2021, Allied Universal promises its workers that it is committed to ensuring that no employee is discriminated against or harassed by a supervisor, or any other person in the workplace. It promises that a safe, respectful, and inclusive work environment is paramount.
18. In its employee handbook at the time, Allied Universal promises that it does not discriminate against employees, and forbids all forms of unlawful discrimination and harassment.

Foreseeability of the problem

19. On average, in Texas alone the EEOC receives over 8,400 charges of discrimination each year.⁸
20. A glassdoor survey revealed that 61%, or about three in five U.S. employees have witnessed or experienced discrimination in the workplace.⁹
21. In its report on “the State of Workplace Discrimination 2021,” AllVoices found that 55% of the employees surveyed have experienced discrimination at their current company.¹⁰

⁷ *Id.*

⁸ See U.S. EEOC FY 2009-2021 EEOC CHARGE RECEIPT FOR TX, <https://www.eeoc.gov/statistics/enforcement/charges-by-state/TX>

⁹ See *New Study: 3 in 5 U.S. Employees Have Witnessed or Experienced Discrimination*, GLASSDOOR, July 22, 2020, <https://www.glassdoor.com/blog/new-study-discrimination/>

¹⁰ See *The State of Workplace Discrimination 2021*, ALLVOICES, Dec. 14, 2021, <https://www.allvoices.co/blog/state-of-workplace-discrimination#:~:text=prevalent%20is%20it%3F-,55%25%20have%20experienced%20discrimination%20at%20their%20current%20company,45.1%25%20said%20they%20have%20not.>

22. A report noted by the EEOC “found that 75% of employees who spoke out against workplace mistreatment faced some form of retaliation.”¹¹
23. Without sufficient protection, discrimination and retaliation in the workplace are foreseeable consequences.
24. Allied Universal has received many reports of discrimination.
25. Allied Universal has received many reports of retaliation.
26. With as many as 800,000 employees in its workforce, Allied Universal knows that discrimination and retaliation are a foreseeable problem in its workplace.

The purpose of the law

27. The THCRA, Title VII, and Section 1981 are all meant to prevent discrimination and retaliation from occurring in the workplace.
28. These antidiscrimination statutes are meant to protect employees from discrimination and retaliation in the workplace.
29. Our community has the right to expect that companies will protect employees from discrimination and retaliation in the workplace.
30. Our community has the right to expect that companies will hire qualified human resources (“HR”) representatives to protect employees from discrimination and retaliation in the workplace.
31. Our community has the right to expect that companies will adequately train all employees to follow all State and Federal antidiscrimination laws.

¹¹ See *Select Task Force on the Study of Harassment in the Workplace*, U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, June 2016, <https://www.eeoc.gov/select-task-force-study-harassment-workplace> (citing Lilia M. Cortina & Vicki J. Magley, *Raising Voice, Risking Retaliation: Events Following Interpersonal Mistreatment in the Workplace*, 8:4 J. Occupational Health Psychol. 247, 255 (2003)).

- 32. Our community has the right to expect that companies will adequately train all managers and supervisors to follow all State and Federal antidiscrimination laws.
- 33. Our community has the right to expect that companies will adequately supervise managers to ensure they follow all State and Federal antidiscrimination laws.
- 34. Our community has the right to expect that companies will have systems in place to prevent any form of discrimination against employees in the workplace.
- 35. Our community has the right to expect that companies will have systems in place to prevent any form of retaliation against employees that report discrimination in the workplace.
- 36. Our community has the right to expect that companies will fairly investigate all reports of discrimination to protect employees from wrongful termination.

Allied Universal's systemic failures

- 37. Allied Universal hires HR personnel that are not qualified or trained to follow the law prohibiting discrimination and retaliation in the workplace.
- 38. Allied Universal chooses not to train all employees to follow our laws prohibiting discrimination and retaliation in the workplace
- 39. Allied Universal chooses not to train all employees to follow its policies aimed at preventing discrimination and retaliation in the workplace.
- 40. Allied Universal chooses not to adequately supervise or monitor its workforce to ensure its management follows our laws and its own policies prohibiting discrimination and retaliation.

**Allied Universal's systemic failure to prevent discrimination and retaliation
results in discrimination and retaliation**

41. In December of 2021, very near the holidays, Allied Universal hires several new security guards in Houston, Texas. Because there is a shortage of security guards, including armed guards, Allied does not train the guards at or near their hiring.
42. After about a month of working as an armed guard, one of its new security guards, is placed into Allied Universal's Elite training program. This new guard is Kurdish, with a deep Kurdish ancestry. He is originally from Iraq, but is now a U.S. citizen. The Elite program is specifically for former military and police officers. Typically, those in the Elite program will be placed at H-E-B grocery store job sites.
43. During this training, one of Allied Universal's managers, named Patrick Freeney repeatedly makes fun of a Hispanic guard's accent. Eventually the Hispanic guard quits.
44. Patrick Freeney then tells the new Kurdish guard that he must shave his beard. He hears the guard explain that he cannot shave his beard because it is part of his religion (Muslim) to maintain a beard. Patrick responds that it is against Allied Universal's policy for the guards to have a beard. Patrick does not tell the other guards in class with beards they need to shave.
45. A few weeks later, one of Allied Universal's supervisors also tells the Kurdish guard that he must shave his beard. Again, the new guard explains that it is part of his religion to keep a beard. At no point does the manager or supervisor tell the new guard that he may request a religious accommodation.
46. Allied Universal continues to pressure the guard to shave his beard. Eventually he ends up shaving his beard in fear that if he does not, he will lose his job. When he starts working at

different posts, however, he notices other security guards have beards at the same posts, some much longer than the beard he used to have.

47. Allied Universal issues several new security guards body cameras. It chooses not to issue one to the Kurdish guard.

48. Allied Universal issues several new security guards company IDs or company badges. It chooses not to issue one to the Kurdish guard.

49. Allied Universal receives a request from the Kurdish guard for a badge and a body camera. It tells him repeatedly that none are available. Allied Universal continues issuing these items to other guards and chooses not to issue a body camera or badge to the Kurdish guard.

50. Soon after, Allied Universal's manager Patrick accuses the guard of missing a day of work. The guard proves to Patrick he did not miss a day. Patrick grows irate and starts screaming in the guard's face yelling something along the lines of:

"If you're lying to me, I will fry you like a fucking chicken. I will fuck up your world. This is America. This is not where you came from. This is America, we run things differently. I don't know how the fuck you got into the military, a dumbass like you."

51. Not long afterward, in April of 2022, the Kurdish guard is stationed at an H-E-B grocery store, on duty. The H-E-B store manager sends the guard a text message with some pictures of a man in the store. The text message states, "If on property he needs to leave." Under the pictures the store manager writes: "Attempted beer theft."

52. The guard recognizes the man from a different H-E-B store where he was previously stationed. The man was arrested before.

53. The store manager calls the guard and states that he needs the guard inside the store. The guard recognizes that there are two men working together. These men are not allowed on H-E-B property.
54. The store manager says the men are stealing. He says they were kicked out earlier the same day. They are stealing a lot of beer and merchandise. The men walk around the cashier to leave the premises. The manager tells the guard not to let the men take any merchandise and asks the guard to stop them. When the guard asks the men to pay for the merchandise at the door, one of the men threatens to cut the guard up with a knife. The man is drunk. The guard asks the manager to call the police and detains the man in handcuffs.
55. While the guard is detaining the man, the police arrive and take custody of both men.
56. The next day, Allied Universal's manager, Patrick Freeney asks the guard to sign a report of the incident. The report is typed up and printed out. It states that the guard got out of his car and approached the drunk man for no reason, then pushed and handcuffed him. The report is a lie. The guard refuses to sign the report because it is not true. Patrick says it will look bad on the Kurdish guard. Patrick gets visibly angry and says "I'm done with your dumbass." Patrick tells the guard he is suspended. He tells the guard he must return the next day to turn in his gun and taser.

57. Patrick then says something along the lines of:

“I will recommend you be fired. If you’re not fire, I will do the best of my ability to get rid of you and fire you. I am gonna take your security license away. I will press charges on you for stealing my stuff if you don’t return it. I will destroy you and fry you like a chicken. If you don’t like it, you can go back to where you came from.”

58. The next day, when the guard returns to turn in his taser and hand gun, Patrick is on the phone. Patrick tells the person on the phone,

“Hold on, I’m just here dealing with this sand-ni**er.”

59. The guard tells Allied Universal’s manager Patrick that he is discriminating against him. Patrick gets up, closes the door, and starts cussing and threatening the guard all over again.

60. The Kurdish guard is Twana Ahmed. He reports all of this in person to Allied Universal’s human resource representative. Nothing happens. He reports to Allied Universal’s HR in writing, explaining that Patrick used racial slurs, physical threats, and he explains the discrimination and retaliation that Patrick forced him to endure. And still nothing happens.

61. At this point Allied Universal HR appears not to know about Twana’s suspension. Twana asks what the status of his suspension is, and HR responds that it does not know.

62. Allied Universal never communicates to Twana that he is terminated.

63. About a month after his reports, while Twana is trying to get more information about the status of his suspension, he finds out through an Allied Universal recruiter that he is marked ineligible for rehire.

COVERED EMPLOYER & EMPLOYEE

64. At all times relevant to this case Allied Universal was and is an employer within the meaning of TCHRA, Title VII, and Section 1981. Allied Universal employed Twana as an employee at all times relevant to this case within the meaning of the TCHRA, Title VII, and Section 1981.

EXHAUSTION OF ADMINISTRATIVE REMEDIES & TIMELINESS

65. Twana exhausted all administrative remedies required as a pre-requisite to filing this civil action. He timely dual-filed a charge of discrimination with (1) the Equal Employment Opportunity Commission (“EEOC”) and (2) the Texas Workforce Commission Civil Rights Division (“TWC”). Twana provided the TWC more than 180 days to investigate his charge of discrimination, and Twana timely filed this civil action within 90 days of receipt of an EEOC notice of right to sue.

66. Twana timely brings suit before the second anniversary of the date he dual-filed the charge of discrimination. He has not received any notice of right to file a civil action from the TWC. Pursuant to TCHRA § 21.252(d), failure to issue the notice of right to file a civil action does not affect his right to bring this suit.

67. Under Section 1981 there are no administrative exhaustion requirements. All of Twana’s claims are brought within the statute of limitations applicable to Section 1981.

**CLAIM FOR RELIEF [TCHRA, TITLE VII, AND SECTION 1981]:
RACE AND ANCESTRY DISCRIMINATION**

68. The abbreviated background and allegations contained in all paragraphs of the petition are hereby incorporated by reference with the same force and effect as if set forth verbatim.
69. The conduct described above shows that Allied Universal violated the TCHRA and Title VII by using race as a motivating factor in its treatment of employees throughout its work environment, and through its practices surrounding suspension, investigation, and termination decisions. These unlawful employment practices are ongoing.
70. As a result of its unlawful employment practices, Allied Universal caused Twana harm, and likely caused harm to many other employees on the basis of their race.
71. The conduct described above shows that Allied Universal violated Section 1981 by using race, ethnic characteristics, or ancestry in its treatment of employees throughout its work environment, and through its practices surrounding suspension, investigation, and termination decisions. But for Twana's race or ancestry, Allied Universal would not have subjected him to racial slurs or verbal and physical threats. But for Twana's race or ancestry, Allied Universal would not have suspended Twana for refusing to sign a false incident report. But for Twana's race or ancestry, Allied Universal would not have retaliated against Twana when he opposed its discrimination. But for Twana's race or ancestry, Allied Universal would not have terminated Twana.
72. As a result of the above, Allied Universal caused Twana harm, and likely caused harm to many others on the basis of their race.

**CLAIM FOR RELIEF [TCHRA AND TITLE VII]:
NATIONAL ORIGIN AND RELIGIOUS DISCRIMINATION**

73. The abbreviated background and allegations contained in all paragraphs of the petition are hereby incorporated by reference with the same force and effect as if set forth verbatim.
74. The conduct described above shows that Allied Universal violated the TCHRA and Title VII by using national origin and religion as motivating factors in its treatment of employees throughout its work environment, and through its practices surrounding suspension, investigation, and termination decisions. These unlawful employment practices are ongoing.
75. As a result of its unlawful employment practices, Allied Universal caused Twana harm, and likely caused harm to many other employees on the basis of their national origin or religion.

**CLAIM FOR RELIEF [TCHRA, TITLE VII, AND SECTION 1981]:
RETALIATION**

76. The abbreviated background and allegations contained in all paragraphs of the petition are hereby incorporated by reference with the same force and effect as if set forth verbatim.
77. The conduct described above shows that Allied Universal violated the TCHRA, Title VII, and Section 1981 by retaliating against employees that report or oppose discrimination. These unlawful employment practices are ongoing.
78. The conduct described above shows that Allied Universal retaliated against employees through its practices surrounding suspension, investigation, and termination decisions. But for Twana's opposition to discrimination, Allied Universal would not have suspended Twana for refusing to sign a false incident report. But for Twana's reports of discrimination, Allied Universal would not have terminated Twana.
79. As a result of the above, Allied Universal caused Twana harm, and likely causes harm to many other employees that report or oppose discrimination.

80. There may be more than one cause for an employment decision. If the jury does not believe the reason Allied Universal offers for its adverse actions, the jury may infer that Allied Universal would not have taken such adverse action but for Twana's protected activity.

CONDITIONS PRECEDENT

81. All conditions precedent to filing suit and to recovery on the asserted claims have occurred or been complied with.

EQUITABLE RELIEF

82. Private plaintiffs and their counsel in unlawful employment practice cases act as private attorneys general to serve the ultimate purposes of civil rights laws, such as prevention and elimination of discrimination. Due to the systemic problems at Allied Universal, there is a reasonable likelihood that Allied Universal will not comply with these civil rights laws in the future. Allied Universal has not taken steps to show that it is unlikely to discriminate in the future. Allied Universal has not taken steps to show that it is unlikely to retaliate based on protected activity in the future.

PUNITIVE DAMAGES

83. Allied Universal engaged in discriminatory practices, including retaliation, with malice or with reckless indifference to the state-protected rights and federally-protected rights of its employees, including Twana. This petition seeks punitive damages sufficient to punish Allied Universal and to deter similar conduct in the future – in accordance with the TCHRA, Title VII, and Section 1981.

ATTORNEY'S FEES

84. As a result of Allied Universal's conduct, Twana hired attorneys to represent him in

pursuing the claims asserted in this case. He seeks to recover reasonable attorneys' fees in connection with this case, including all appeals, pursuant to the TCHRA, Title VII, and Section 1981.

JURY DEMAND

85. Twana requests a jury trial on all issues triable of right or choice by a jury.

REMEDIES REQUESTED

86. Texas Rule of Civil Procedure 47 requires an original petition to select among specified ranges of potential relief. This original petition selects the range in Texas Rule of Civil Procedure 47(c)(4). This range may change over time. Twana is free to suggest more or less based on the evidence. The jury and judge are free to find more or less at trial based on the evidence.

87. This rule is meant to identify any expedited actions and the nature of the case at the time of filing. The rule does not affect a party's substantive rights.

88. Twana respectfully requests the following remedies:

- a. Judgement against defendant on all claims asserted herein;
- b. Upon a finding that defendant engaged in an unlawful employment practice or practices, appropriate injunctive relief prohibiting defendant from engaging in such unlawful employment practices in the future (with specifics to be tailored to the problems, deficiencies, and gaps that the evidences shows);
- c. The following additional equitable relief:
 - i. Requiring defendant to adopt and implement procedures and policies better designed to ensure that race, ancestry, religion, or national origin

play no role in its work environment or employment decisions—with specifics to be tailored to the problems, deficiencies, and gaps that the evidence shows;

- ii. Requiring defendant to provide training to all employees in the United States on discrimination prevention and related compliance with the civil rights laws violated—with the training specifics to be tailored to the problems, deficiencies, and gaps that the evidence shows;
- iii. Requiring defendant to provide training to all employees in the United States on retaliation prevention and related compliance with the civil rights laws violated—with the training specifics to be tailored to the problems, deficiencies, and gaps that the evidence shows;
- iv. Requiring defendant to report on the manner of compliance with the terms of any final order for non-monetary equitable relief issued under the civil rights laws violated—with the reporting specifics to be tailored based on the evidence;
- v. Equitable relief in the form of prejudgment interest;
- vi. All further equitable relief, including back pay and front pay, that may be appropriate based on the evidence;
- d. Compensation for past emotional pain, suffering, inconvenience, mental anguish, and loss of enjoyment of life, and other nonpecuniary losses;
- e. Punitive damages;
- f. Reasonable attorneys' fees and costs, including reasonable expert fees;

- g. Costs under the Texas Rules of Civil Procedure;
- h. Post-judgment interest as allowed by law; and
- i. All other relief to which he may show himself justly entitled under law or in equity.

REQUIRED DISCLOSURES

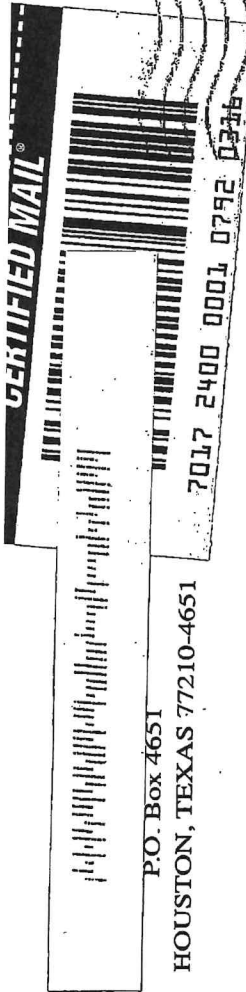
Pursuant to Texas Rule of Civil Procedure 194(a), each Defendant is required to disclose, within thirty (30) days of the filing of the first answer, the information or material described in Rule 194.2(b)1-12. Any Defendant that is served or otherwise joined after the filing of the first answer must make their initial disclosures within thirty (30) days after being served or joined.

PRAYER

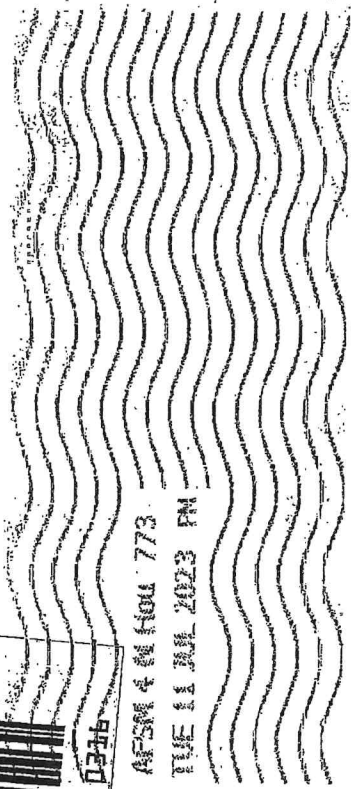
For the reasons set forth above, Plaintiff, Twana Ahmed respectfully prays that the Defendant be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Plaintiff against Defendant for damages in an amount within the jurisdictional limits of the Court and such other and further relief to which the Plaintiff may be entitled at law or in equity.

RESPECTFULLY SUBMITTED

/s/ Amanda C. Hernandez
Amanda C. Hernandez
State Bar No. 24064411
5718 Westheimer, Suite 1000
Houston, TX 77057
Tel: 713-588-4359
Email: amanda@ahfirm.com
Attorney for Twana Ahmed



07/11/2023
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UNIVERSAL PROTECTION SERVICE, LP
D/B/A ALLIED UNIVERSAL C/O
CORPORATION SERVICE COMPANY
211 E. 7TH STREET SUITE 620
AUSTIN, TX 78701
202339279 334TH



202339270 - AHMED, TWANA vs. UNIVERSAL PROTECTION SERVICE LP (DBA ALLIED

UNIVERSAL) (Court 334)

Print All (non-financial)
[Chronological History](#)

<u>Summary</u>	+
<u>Appeals</u>	+
<u>Cost Statements</u>	+
<u>Transfers</u>	+
<u>Post Trial Writs</u>	+
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109080772	Filing	Civil Case Information Sheet			07/10/2023	2	Add to Basket
109084311	Filing	Civil Request for Issuance of Service			07/10/2023	2	Add to Basket
109135373	Filing	Certified Mail Tracking # 7017 2400 0001 0792 0316			07/10/2023	2	Add to Basket
108878832	Filing	Original Petition and Jury Demand			06/26/2023	18	Add to Basket

7017 2400 0001 0792 0316

P.2

CAUSE NO. 202339270

RECEIPT NO. 1001388

75.00

CTM

TR # 74192952

PLAINTIFF: AHMED, TWANA
vs.DEFENDANT: UNIVERSAL PROTECTION SERVICE LP (DBA ALLIED
UNIVERSAL)In The 334th
Judicial District Court
of Harris County, Texas
334TH DISTRICT COURT
Houston, TX

CITATION (CERTIFIED)

THE STATE OF TEXAS
County of HarrisTO: UNIVERSAL PROTECTION SERVICE, LP D/B/A ALLIED UNIVERSAL BY SERVING ITS
REGISTERED AGENT CORPORATION SERVICE COMPANY D/B/A CSC LAWYERS
INCORPORATING SERVICE COMPANY
OR WHEREVER THE REGISTERED AGENT MAY BE FOUND

211 EAST 7TH STREET SUITE 620 AUSTIN TX 78701

Attached is a copy of PLAINTIFFS ORIGINAL PETITION AND JURY DEMANDThis instrument was filed on the 10th day of July, 2023, in the above cited cause number
and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a
written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday
next following the expiration of 20 days after you were served this citation and petition,
a default judgment may be taken against you. In addition to filing a written answer with the
clerk, you may be required to make initial disclosures to the other parties of this suit. These
disclosures generally must be made no later than 30 days after you file your answer with the
clerk. Find out more at TexasLawHelp.org.

TO OFFICER SERVING:

This citation was issued on 10th day of July, 2023, under my hand and
seal of said Court.

Marilyn Burgess

Issued at request of:
HERNANDEZ, AMANDA CHRISTINE
5718 WESTHEIMER, SUITE 1000
HOUSTON, TX 77057
Tel: (915) 204-8928
Bar No.: 24064411

MARILYN BURGESS, District Clerk
Harris County, Texas
201 Caroline, Houston, Texas 77002
(P.O. Box 4651, Houston, Texas 77210)

Generated By: HARRISON, CONNOR DUW//12320733

CLERK'S RETURN BY MAILING

Came to hand the _____ day of _____, _____, and executed by
mailing to Defendant certified mail, return receipt requested, restricted delivery, a true
copy of this citation together with an attached copy of
PLAINTIFFS ORIGINAL PETITION AND JURY DEMAND
to the following addressee at address:

(a) ADDRESSEE

ADDRESS

Service was executed in accordance with Rule 106
(2) TRCP, upon the Defendant as evidenced by the
return receipt incorporated herein and attached
hereto at

on _____ day of _____,
by U.S. Postal delivery to _____

This citation was not executed for the following
reason: _____

MARILYN BURGESS, District Clerk
Harris County, TEXAS

By _____, Deputy

7017 2400 0001 0792 0316

CAUSE NO. 202339270

RECEIPT NO. 1001388

75.00 CTM

TR # 74192952

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vs.

DEFENDANT: UNIVERSAL PROTECTION SERVICE LP (DBA ALLIED
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mail Burgess

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Harris County, Texas
201 Caroline, Houston, Texas 77002
(P.O. Box 4651, Houston, Texas 77210)Issued at request of:HERNANDEZ, AMANDA CHRISTINE
5718 WESTHEIMER, SUITE 1000
HOUSTON, TX 77057
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Bar No.: 24064411

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This citation was not executed for the following
reason: _____

MARILYN BURGESS, District Clerk
Harris County, TEXAS

By _____, Deputy

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-927-5800 | www.hcdistrictclerk.com

CASE NUMBER: 202339270 **Request for Issuance of Service**
CURRENT COURT: 334

Phone Number: 713-588-4359

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Amanda Hernandez on behalf of Amanda Hernandez
Bar No. 24064411
amanda@ahfirm.com
Envelope ID: 77343505
Filing Code Description: Request
Filing Description: Request for Issuance of Service
Status as of 7/10/2023 12:56 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Amanda Hernandez		amanda@ahfirm.com	7/10/2023 11:15:44 AM	SENT

CIVIL CASE INFORMATION SHEET

7/10/2023 10:50 AM

CAUSE NUMBER (FOR CLERK USE ONLY): 202339270


Marilyn Burgess - District Clerk Harris County
Envelope No. 77341567
By: Patricia Gonzalez

Filed: 7/10/2023 10:50 AM

STYLED Ahmed v. Universal Protection Service, LP dba Allied Universal

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing. This sheet, approved by the Texas Judicial Council, is intended to collect information that will be used for statistical purposes only. It neither replaces nor supplements the filings or service of pleading or other documents as required by law or rule. The sheet does not constitute a discovery request, response, or supplementation, and it is not admissible at trial.

1. Contact information for person completing case information sheet: Name: <u>Amanda Hernandez</u> Email: <u>amanda@ahfirm.com</u> Address: <u>5718 Westheimer, Suite 1000</u> Telephone: <u>713-588-4359</u> City/State/Zip: <u>Houston</u> Fax: <u>281-572-5370</u> Signature:  State Bar No: <u>24064411</u>			Names of parties in case: Plaintiff(s)/Petitioner(s): <u>Twana Ahmed</u> Defendant(s)/Respondent(s): <u>Universal Protection Service, LP dba Allied Universal</u> (Attach additional page as necessary to list all parties)		Person or entity completing sheet is: <input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____ Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____	
2. Indicate case type, or identify the most important issue in the case (select only 1):						
Civil			Family Law			
Contract <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____	Real Property <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____		
Employment <input checked="" type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____	Other Civil <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____					
Tax <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax: _____	Probate & Mental Health Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____					
3. Indicate procedure or remedy, if applicable (may select more than 1):						
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover		

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Amanda Hernandez on behalf of Amanda Hernandez

Bar No. 24064411

amanda@ahfirm.com

Envelope ID: 77341567

Filing Code Description: No Fee Documents

Filing Description: Case Information Sheet

Status as of 7/10/2023 11:17 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Amanda Hernandez		amanda@ahfirm.com	7/10/2023 10:50:44 AM	SENT